

**Letter O-13 – Stuart Weiss – Creekside Science**

- O-13-1** The County acknowledges and appreciates the comment. It will be included as part of the FEIR and considered by the decision makers. However, the comment provides introductory information about the commenter that does not raise any issue or include any substantive comment with regard to the adequacy of the DEIR. For that reason, the County provides no further response to this comment.
- O-13-2** The County acknowledges and appreciates the comment. It will be included as part of the FEIR and considered by the decision makers. However, the comment does not present any issue or make any substantive comment about the adequacy of the DEIR. The Project acknowledges the importance of the site for QCB and includes mitigation and a plan to provide management and monitoring for the species.
- O-13-3** The County agrees that it is inappropriate to base impact significance determinations on the number of QCB adults potentially affected by the proposed Project. For this reason, the EIR's impact assessment is based on the amount of suitable QCB habitat that the proposed Project may affect. As described in Section 6.5 of the Biological Resources Technical Report, prior to the issuance of the first grading permit that impacts QCB, the proposed Project shall demonstrate to the satisfaction of the Director of Planning and Development Services (or their designee) it has secured the necessary take authorization for QCB through either the Section 7 Consultation, Section 10 incidental take permit requirements, or the Quino Amendment to the MSCP, if/when approved. The proposed Project provides preservation of 962 acres of the required mitigation of 966 acres (2 x 483 acres). The proposed Project is required to provide an additional 4 acres of occupied habitat (Figure 28). This mitigation is proposed to be accomplished by restoration of unsuitable habitat within the preserve to suitable coastal sage scrub. Figure 28 illustrates the location of these potential restoration areas. A total of 6.3 acres is designated as potential restoration, of which 4 acres will be needed.
- O-13-4** See Response to Comment O-11-3 regarding survey methods.
- O-13-5** Please refer to Responses to Comments O-13-3 and O-8-5 for the discussion of the analysis of impact to QCB.
- O-13-6** See Response to Comment O-13-3 for the discussion of indirect impacts.
- O-13-7** The County disagrees that the impact will contribute to the collapse of the regional metapopulation. Please refer to Response to Comment O-13-3 for discussion of the analysis of impacts. See Response to Comment O-9-3 for discussion of indirect impacts. Discussion of the mitigation and required permitting for take of the species is provided in Section 6.5 of the Biological Resources Technical Report in Mitigation Measures M-BI-9a and M-BI-9b.
- O-13-8** The County disagrees that the mitigation for the impacts on QCB will be ineffective. A discussion of the mitigation and required permitting for take of the species is provided in Section 6.5 of the Biological Resources Technical Report in Mitigation Measures M-BI-9a and M-BI-9b. See Response to Comment O-13-3. The Project does not propose to mitigate for impacts by restoring areas unknown for occupation by the species but rather proposes to preserve areas onsite that currently are known to be occupied by the species and that contain suitable habitat for the species. The restoration activity will provide improved habitat for the species within areas already occupied by the species as documented in Appendix K of the Biological Resources Technical Report.

- O-13-9** The County acknowledges and appreciates this comment. The comment expresses an opinion on the selection of an alternative and does not raise any new issue or make any new substantive comment concerning the adequacy of the DEIR. Selection of alternatives will be discussed further in the Findings of Fact and Statement of Overriding Considerations. For those reasons, the County provides no further response to this comment.
- O-13-10** The County acknowledges and appreciates the comment. It will be included as part of the FEIR and considered by the decision makers. However, the comment provides literature cited and does not raise any new issue or include any new substantive comment concerning the adequacy of the DEIR. For that reason, the County provides no further response to this comment.
- O-13-11** The County acknowledges and appreciates the commenter's inclusion of his resume and qualifications. This information will be included as part of the FEIR. However, this does not raise any new issue or include any new substantive comment concerning the adequacy of the DEIR. For that reason, the County provides no further response to this comment here. See Response to Comment N-55 for further discussion.